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IN THE UNITED STATES COURT OF FEDERAL CLAIMS

PLACER MINING CO., INC., d/b/a THE
NEW BUNKER HILL MINING CO.,

Plaintiff,

v.

THE UNITED STATES,

Defendant,

Civil Case No. 01-27 L

JOINT STATUS REPORT

(Assigned to the Honorable Eric G.
Bruggink)

Plaintiff Placer Mining Co., Inc. ("Placer Mining") and Defendant United States, by and through their respective counsel and pursuant to this Court's Order dated July 1, 2016 (ECF No. 167), submit this Joint Status Report and recommendation for future proceedings.

Counsel for the parties have conferred and respectfully request that the Court stay this action for an additional 180 days, to May 1, 2017. The parties continue to engage in discussions

and undersigned counsel believe that a resolution of this matter, the United States' enforcement action under the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), 42 U.S.C. §§ 9601 *et seq.*, and additional legal and environmental issues between Placer Mining and the United States remain possible, given Placer Mining's continuing efforts to make the Bunker Hill Mine economically viable, and the parties' mutual willingness to reach a workable compromise.

In a previous Joint Status Report, Placer Mining reported about ongoing efforts to "transition to mining on a small scale and process . . . ore." (Dkt. 164 at 2-3). Placer also informed the Court that it was still in the process of seeking potential buyers, and that it "expect[ed] the mining and milling to generate an annual income that [could] be directed to a settlement with the United States." *Id.* Now, Placer advises that its ore processing operations are continuing and that it has recently been exploring the possibility of entering into a joint venture to operate the mine.

In addition, the parties now report that on November 18, 2016, a teleconference was held among representatives of Placer Mining, the EPA, and Department of Justice counsel in the CERCLA enforcement action to discuss certain remedial issues and the broader issue of settling the enforcement action, this action, and other legal issues surrounding the Bunker Hill Mine. The parties are also in the process of working toward improvement in the control and retention of the mine water that is currently being treated by the Environmental Protection Agency's ("EPA") Central Treatment Plant located in Kellogg, Idaho, through the EPA's locally based Region X officials.

In sum, the parties would like the opportunity to continue their dialogue in the hope of resolving this matter and the ongoing environmental issues at the Bunker Hill Mine. The parties

propose they submit a jointly prepared status report no later than May 7, 2016, to update the Court on the parties' progress in resolving this matter.

Respectfully submitted this 2d day of December, 2016.

Stoel Rives LLP

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on December 2, 2016, I electronically transmitted the foregoing document to the Clerk of the U.S. Court of Federal Claims using the ECF System for filing and transmittal of a Notice of Electronic Filing to all counsel of record.

By: /s/ _____
Bryan L. Hawkins